

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Ply Gem
2615 Campbell Road
Sidney, Ohio 45395**

ATTENTION:

**Jesse Aiken
Operations Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Ply Gem (you) to submit certain information about the facility at 2615 Campbell Road, Sidney, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule provided in Appendix B of this Request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Ply Gem owns and operates an emission source at the Sidney, Ohio facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan and the CAA.

Ply Gem must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Ply Gem must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

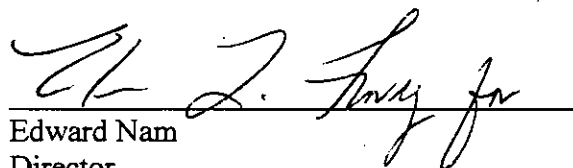
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Ply Gem to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Molly Smith at (312) 353-8773 or smith.molly@epa.gov.

8/3/17
Date


Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, and 40 C.F.R. Part 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil; 40 C.F.R. Part 64, Subpart MMMM, National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products; and 40 C.F.R. Part 60, Subpart TT, Standards of Performance for Metal Coil Surface Coating.

Appendix B

Information You Are Required to Submit to EPA

Ply Gem must submit the following information for the facility located at 2615 Campbell Road, Sidney, Ohio (facility) pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a).

Responses to Items 1-13 must be submitted within thirty (30) days from your receipt of this

Request and responses to Items 14-19 must be submitted within sixty (60) days from your receipt of this Request.

1. Provide a copy of each air permit issued to Ply Gem for the facility by the Ohio Environmental Protection Agency (OEPA), including, but not limited to, permits-to-install, state permits-to-operate, and Part 70 (Title V) Operating Permits, except those available online, for the period of February 1, 2017 through the date you received this Request.
2. Provide a copy of any applications for permits-to-install, including any revised or modified applications, submitted to OEPA for the construction or modification of the following units:
 - a. P060 – Paint Tinting Operations;
 - b. K001 – 39” Coil Coating Line; and
 - c. K002 – 54” Coil Coating Line.
3. Provide a facility-wide process flow diagram depicting the overall process at the facility.
4. Provide a detailed process flow diagram and photographs for the following operations at the facility: K001, K002, and P060. For each process flow diagram, include a detailed narrative process description to explain the diagram. For each photograph, provide a coded diagram/map to clearly identify the location of the image in the photograph within the facility. Photographs should correspond to each of the process stages described in the process flow diagram. Diagrams and photographs should include all capture and control equipment associated with air emissions.
5. Provide copies of all stack testing, internal audits, emissions test runs, emissions characterizations, or emissions studies, conducted or attempted at the facility for the period of February 1, 2007 through the date you received this Request. Include results of any Method 24 or formulation testing on coatings, adhesives, paints, tinting agents, and cleanup solvents used in the process at the facility.

6. Provide copies of all annual emission reports submitted to OEPA from February 1, 2007 to the date you received this Request, and include:
 - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used;
 - b. A table describing the assumed/estimated capture efficiencies for any capture device(s) and the associated emission unit(s), including supporting documentation for the assumptions or estimation;
 - c. A table describing the assumed/estimated control efficiencies/total destruction efficiencies for any control device(s) and the associated emission unit(s), including supporting documentation for the assumptions or estimation; and
 - d. Any documents outlining procedures for calculating annual emissions.
7. Provide copies of any deviation reports, excess emission reports, or similar notifications provided to OEPA from February 1, 2007 to the date you received this Request.
8. Provide copies of the reports listed below submitted for K001 and K002, as required under 40 C.F.R. Part 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil (Subpart SSSS). For any reports requiring multiple submissions, only submit information from February 1, 2012 to the date you received this Request. For reports requiring a single submission, submit the report regardless of its date:
 - a. 40 C.F.R. § 63.5180(b), initial notification or acceptable Title V permit application;
 - b. 40 C.F.R. § 63.5180(c), the Notification of Performance Tests;
 - c. 40 C.F.R. § 63.5180(d), the Notification of Compliance Status;
 - d. 40 C.F.R. § 63.5180(f), any start-up, shutdown, and malfunction reports, if not already provided in Item 7, above;
 - e. 40 C.F.R. § 63.5180(g), all semi-annual compliance reports;
 - f. 40 C.F.R. § 63.5180(h) and (i), any deviation reports, if not already provided in Item 7, above; and
 - g. 40 C.F.R. § 63.5190(a) and (b).
9. Provide a list of all coatings, adhesives, paints, tinting agents, and cleanup solvents (collectively, the "materials") used in the processes at the facility since February 1, 2012 to the date you received this Request. For each material listed, provide the associated Safety Data Sheet (SDS). Ensure that each SDS clearly identifies the volatile organic compound (VOC) and hazardous air pollutant (HAP) content for each material used. The VOC and HAP content should be provided as applied (pounds per gallon and kilograms per liter) and by percent (by weight VOC), excluding water and exempt solvents (if applicable).

10. For the process units K001, K002, and P060 at the facility, provide the following information on a *monthly* basis from February 1, 2012 to the date you received this Request. Provide the information in Microsoft Excel format.
 - a. The name and amount of each material (defined in Item 9 above) applied (gallons);
 - b. The VOC content for each material, as applied (pounds per gallon and kilograms per liter), as identified in the SDS provided in Item 9, above;
 - c. The total VOC emissions from each individual material applied (pounds and kilograms);
 - d. The total VOC emissions of all materials applied or used (Item 10(c) above) (pounds and kilograms); and
 - e. The rolling, 12-month sum of the total VOC emissions (Item 10(d) above).
11. Provide documentation related to the applicability of 40 C.F.R. Part 60, Subpart TT - Standards of Performance for Metal Coil Surface Coating (NSPS Subpart TT) to K001, 39" coil coating line. Provide copies of any correspondence with OEPA on the applicability of NSPS Subpart TT to this line.
12. For the period February 1, 2012 to the date you received this Request, provide copies of the records maintained to comply with 40 C.F.R. § 60.464(a) through (c) of NSPS Subpart TT. Provide the information in Microsoft Excel format. Records should be consistent with 40 C.F.R. § 60.465 and clearly identify Ply Gem's selected compliance method (e.g., VOC coating content or emission control device).
13. For the period February 1, 2012 to the date you received this Request, provide copies of the records maintained to comply with 40 C.F.R. §§ 63.3910-3920 of the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (Subpart MMMM). Where applicable, provide the information in Microsoft Excel format. Records should be consistent with 40 C.F.R. § 63.3930. The response must include the initial notification. Additionally, the response must include all Notifications of Compliance Status reports, deviation reports, and semiannual reports for the date range requested, if not previously provided.
14. Identify and describe, in a chronologically organized table, all capital expenditures greater than \$50,000 commenced at the emission units and process equipment at the facility from February 1, 2007 until the date you received this Request. This list must contain the approximate date each project commenced, the date each project was completed or implemented, a brief description of each project that identifies the work completed, the dollar amount approved for each project, and the dollar amount expended for each project. This should include, but not be limited to, capital expenditures associated with changes in fuel type, fuel feed operations, raw material feed rates, production rates, new process equipment, emission rates, and/or air pollution control equipment. If Ply Gem or its predecessor(s) received a permit for the project, provide the permit number.

15. For each capital expenditure identified in response to Item 14 that was more than \$100,000, provide copies of all capital appropriation requests, financial justifications, and authorizations, including attachments and addenda, generated by or prepared on behalf of Ply Gem or its predecessor(s) concerning that project.
16. Provide a list of all air quality enforcement actions related to the facility taken by any state or local regulatory agency from February 1, 2007 to the date you received this Request. Include copies of any air quality-related administrative or judicial complaints; any notices of violation or notices of noncompliance; any documents resolving violations, such as consent decrees or consent orders; and any orders, such as administrative orders.
17. To the extent not provided before, provide copies of any correspondence, from February 1, 2007 through the date you received this Request, between Ply Gem and the state, local, or federal permitting authority regarding the installation or modification of any emissions unit or the emission limits for any emissions unit at the Facility, including, but not limited to, applicability determinations, regulatory interpretations, and approval orders.
18. Provide copies of all documents generated on or after February 1, 2007, related to the applicability of New Source Performance Standards promulgated pursuant to CAA section 111 or the CAA's New Source Review and/or Prevention of Significant Deterioration programs to the facility.
19. Provide all records generated since February 1, 2007, pursuant to 40 C.F.R. § 52.21(r)(6).

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

Jess Aiken
Operations Manager
Ply Gem
2615 Campbell Road
Sidney, Ohio 45365

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Bob Hodanbosi
Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
bob.hodanbosi@epa.ohio.gov

Craig Osborne
Division of Air Pollution
Southwest District Office
Ohio Environmental Protection Agency
craig.osborne@epa.ohio.gov

On the 6 day of March 2017.



Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

7014 2870 0001 9578 9206